



June 28, 2021

Submitted electronically

Chairman Michael M. Kubayanda
Commissioner Robert Taub
Commissioner Mark Acton
Commissioner Ann C. Fisher
Commissioner Ashley E. Poling
Postal Regulatory Commission
901 New York Avenue, NW, Suite 200
Washington, DC 20268

Re: Docket No. R2021-2

Dear Commissioners:

In response to the filing made by the United States Postal Service on May 28, 2021 – “Notice of Market-Dominant Price Change” – and in accordance with Sec. 3010.140 of the Postal Regulatory Commission’s Rules of Practice, the North Carolina Association of Electric Cooperatives (NCAEC) submits these comments.

NCAEC joins the National Rural Electric Cooperative Association (NRECA) and the Alliance of Nonprofit Mailers in urging the Commission to deny the request to significantly increase postage rates. If approved as filed, these increased rates will have a significant and detrimental impact on rural North Carolina, as well as other parts of the country served by electric cooperatives.

NCAEC represents the interests of North Carolina’s 26 member-owned, not-for-profit, rural electric cooperatives. North Carolina’s electric cooperatives collectively serve more than 2.5 million North Carolinians in 93 of the state’s 100 counties. North Carolina’s electric cooperatives utilize mail for many reasons, including distributing monthly bills and the monthly Carolina Country magazine to their members. Since 1946, Carolina Country has provided cooperative members with information that can help them make their homes more energy efficient, participate in cooperative energy management programs, and otherwise save money on their electric service. The magazine also provides critical governance information including, for example, how members can participate in electing directors to represent them on the cooperatives’ boards of directors.

Many members prefer to receive their monthly bill by mail. Similarly, our research shows that a digital product simply cannot serve our members as well as a mailed physical magazine.¹

Because mail remains such a critical component of our empowerment mission, we cannot avoid the cost associated with any increase in postage rates. And because cooperatives are not-for-profit and consumer-owned, they will be forced to pass on the full cost of any postage rate increases to their members. The proposed increased postage costs will negatively impact North Carolina's electric cooperatives and their rural members, many of whom already face significant economic challenges.

For these reasons, NCAEC joins NRECA and the Alliance of Nonprofit Mailers in urging you to deny these rate increases.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Youth', with a long, sweeping horizontal line extending to the right.

Michael Youth
Government and Regulatory Affairs Counsel
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¹According to a 2019 Gfk MRI survey, 82% of readers prefer to receive news about their co-op from Carolina Country magazine versus other forms of communication; 96% prefer to receive a printed copy of the magazine over a digital version.